Conflict of Interest Policy

1. Policy Statement

Delton Contracts Services Ltd. is committed to maintaining the highest standards of integrity, ethical conduct, and transparency in all aspects of our operations. This Conflict of Interest Policy outlines how we identify, manage, and mitigate conflicts of interest to ensure that business decisions are made in the best interests of the company, free from improper influence.

This policy applies to all individuals performing work for or on behalf of Delton Contracts Services Ltd., including directors, employees (permanent, fixed-term, or temporary), consultants, contractors, and others providing services to the company.

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2. Definition of Conflict of Interest

A conflict of interest arises when an individual's personal, financial, professional, or other interests — or those of someone connected to them — could interfere with their duty to act in the best interests of Delton Contracts Services Ltd. Such conflicts can be actual, potential, or perceived.

3. Identifying Conflicts of Interest

Examples of situations that may create conflicts of interest include (but are not limited to):

Personal relationships with other employees, clients, suppliers, contractors, or competitors (e.g., family, close friends, romantic partners) where impartial decision-making might be influenced.
Holding external business interests, part-time roles, directorships, investments, or advisory positions that compete with, conflict with, or affect responsibilities to Delton Contracts Services Ltd.
Situations where an individual stands to benefit personally from decisions they are involved in making on behalf of Delton Contracts Services Ltd.

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4. Disclosure and Review Process

Employees and other relevant individuals must disclose any actual, potential, or perceived conflict of interest as soon as they become aware of it. Disclosures should be made to the individual's Line Manager or the Compliance Team.

4.1. Register of Interests

All disclosed interests will be recorded in the Delton Contracts Services Ltd. Conflict of Interest Register, maintained by the Compliance Team.

4.2. Review and Mitigation

- Disclosed interests will be reviewed to determine whether a conflict exists and, if so, what mitigating actions are appropriate.
- Mitigating actions may include adjusting responsibilities, recusal from certain decisions, or requiring the individual to cease the conflicting activity.

Reviews will take place regularly or when circumstances change.

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4.3. Notification

If appropriate, affected third parties may be notified about conflicts or measures taken to address them.

5. Management of Conflicts

When a conflict of interest is identified:

- The Compliance Team — together with senior management if necessary — will decide how to manage or eliminate the conflict.
- Individuals involved in conflicts may be required to withdraw from decision-making processes related to the conflict.
- Actions taken will be documented and reviewed periodically.

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6. Consequences of Non-Disclosure

Failure to disclose a conflict of interest — or to cooperate with mitigation measures — may lead to disciplinary action, up to and including termination of employment or contract, depending on the severity and impact of the conflict.

7. Confidentiality

All disclosures and related discussions will be treated confidentially to the extent permitted by law and the needs of the review process.

8. Policy Ownership and Review

The responsibility for implementation and oversight of this policy lies with the CEO of Delton Contracts Services Ltd. This policy will be reviewed annually or following significant organisational changes.

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Approved by	G.Singh Director	Signed:	Date 6/3/2025

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